

Peter Davies
Smart Energy Code Panel Chair
SECCo Ltd
8 Fenchurch Place
London, EC3M 4AJ

Rachel Clark
Switching Programme
Ofgem
9 Millbank
London
SW1P 3GE
October 2017

3rd November 2017

Dear Rachel,

Re: Delivering Faster and More Reliable Switching: proposed new switching arrangements

The Smart Energy Code (SEC) Panel welcomes the opportunity to respond to Ofgem's consultation on Delivering Faster and More Reliable Switching: proposed new switching arrangements. This response represents the collective views of the SEC Panel which were discussed at the October 2017 Panel meeting.

The Panel notes that the new switching arrangements consultation is proposing the introduction of a new Retail Energy Code (REC), in which the obligations and requirements for the switching arrangements will sit. The Panel are supportive of the introduction of the REC, and agree that it is logical that ownership of this new code should sit with Suppliers to support the harmonisation of faster switching.

As part of the switching arrangements, it is acknowledged that there will be an expansion of the DCC's role as set out within the Licence Conditions and that obligations and requirements on the DCC will be set out in the REC. The SEC Panel is aware that this will be under a separate governance regime. However, the Panel wish to raise that the regulatory framework should ensure that there are no conflicts for the DCC in meeting their obligations under both the SEC and the REC. Further, the Panel would like to seek assurance and regulatory oversight to ensure that the additional DCC role does not diminish or detract from compliance with the DCC's obligation to meet its SEC obligations.

The Panel also notes that it had previously provided SEC support to the faster switching programme, in part, to ensure that the impacts on the SEC were taken into consideration and there was a consistent perspective present in the formation of the programme. Regardless of the continued support provided from the SEC Panel, it is important that the concerns highlighted above should be taken into consideration.

If you would like to discuss our response, please contact SECAS in the first instance on 020 7090 7755 or secas@gemserv.com.

Yours sincerely,



Peter Davies

SEC Panel Chair

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